

**Rules of procedure
for the complaints procedure
in accordance with the Act on Corporate Due Diligence Obligations in Supply
Chains (LkSG)***

As of July 31, 2024

***Note:** These rules of procedure apply directly to complaints procedures under the LkSG. However, they apply mutatis mutandis to information of all kinds within the meaning of the German Act for Better Protection of Whistleblowers (Whistleblower Protection Act – HinSchG).

The HinSchG facilitates the reporting and disclosure of information regarding violations of European law (including corresponding national law) as well as violations of legal provisions subject to criminal penalties and fines. Information within the meaning of the HinSchG can therefore relate to the following topics, for example:

- theft, bribes, and monetary benefits
- fraud, embezzlement
- conflicts of interest
- insider trading
- antitrust matters (violation of antitrust law and/or competition law)
- money laundering
- manipulation within the scope of accounting
- environmental protection
- health, occupational safety, and operational safety
- data protection
- Beckhoff Code of Conduct

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Foreword

As a responsible group of companies, Beckhoff Automation GmbH & Co. KG and Elektra I GmbH (together “**Beckhoff**”) afford compliance with laws, regulations, and internal guidelines the highest priority. Compliance with regulations and standards is the only way we can prevent harm to our employees, our business partners, and ourselves as a group of companies.

Against this background and in fulfillment of the requirements of the Act on Corporate Due Diligence Obligations in Supply Chains (“**LkSG**”), Beckhoff operates a complaints procedure for reporting information relating to human rights and environmental risks, and the violation of human rights and environment-related obligations, in its own business area and along the supply chain.

The complaints procedure is a confidential and secure reporting system that ensures a high level of protection for whistleblowers.

These publicly available rules of procedure are based on Section 8 (2) LkSG.

1. Personal and material scope of application

Summary: Complaints about risks and violations can be submitted internally and externally by those affected. In addition, third parties who are not directly affected or whose legal position has been violated can also submit complaints about human rights or environment-related risks or violations. Complaints can be submitted at any time.

In particular, you can use the complaints procedure as an employee of Beckhoff or as an employee of a company affiliated with Beckhoff (together “**Beckhoff Group**”) or as an external person if you are affected by human rights or environment-related risks in accordance with Section 2 (2) and (3) LkSG or by human rights or environment-related violations in accordance with Section 2 (4) LkSG in your own business area of a company of the Beckhoff Group or in the (direct or indirect) supply chain – as defined by Section 2 (5) LkSG – of a company of the Beckhoff Group.

This may be the case, for example, if you are an employee of the Beckhoff Group, an employee of a direct or indirect supplier, a resident living near a local Beckhoff Group site, or a direct or indirect supplier.

The “supply chain” refers to all products and services of the relevant company of the Beckhoff Group. It includes all steps in Germany and abroad that are necessary for the manufacturing of products and the provision of services, from the extraction of raw materials to delivery to the end customer, and covers the actions of a Beckhoff Group company in its own business area, the actions of a direct supplier, and the actions of an indirect supplier.

According to Section 2 (6) LkSG, “own business area” covers any activity of a Beckhoff Group company to achieve the corporate objective. This includes all activities for the creation and utilization of products and the provision of services, regardless of whether they are carried out at a site in Germany or abroad. In affiliated companies, a group company is included in the own business area of the parent company (in the Beckhoff Group, these are Beckhoff Automation GmbH & Co. KG and Elektra I GmbH) if the parent company exercises a decisive influence over the group company.

According to Section 2 (7) LkSG, a “direct supplier” is a party to a contract for the supply of goods or the provision of services whose supplies are necessary for the manufacture of a Beckhoff Group company’s product or for the provision and use of the service in question.

According to Section 2 (8) LkSG, an “indirect supplier” is any company that is not a direct supplier and whose supplies are necessary for the manufacture of a Beckhoff Group company’s product or for the provision and use of the service in question. Risks and violations concerning indirect suppliers can also be reported in the complaints procedure in accordance with Section 9 (1) LkSG.

Examples of risks and violations in relation to human rights include:

- child labor
- forced labor and slavery
- local occupational health and safety violations with accident or work-related health hazards
- disregard for freedom of association
- discrimination and unequal treatment in employment
- withholding an adequate local (minimum) wage
- causing harmful soil changes, water pollution, air pollution, noise emissions, and excessive water consumption
- unlawful eviction, deprivation of land, forests, and waters in the acquisition, development, or other use of land, forests, and waters whose use secures a person’s livelihood
- hiring or using private or public security forces to protect the company’s project if, due to a lack of instruction or control on the part of the company, the use of security forces is in violation of the prohibition of torture and cruel, inhumane, or degrading treatment, damages life or limb, or impairs the right to organize and the freedom of association

Examples of risks and violations in relation to environmental rights include:

- manufacture of mercury-added products, use of mercury and mercury compounds in manufacturing processes, and treatment of mercury waste
- production and use of persistent chemicals
- non-environmentally sound handling, collection, storage, and disposal of waste as well as export and import of hazardous waste

Affected persons and whistleblowers can report information on human rights risks and environment-related risks as well as violations of human rights or environment-related obligations along the supply chain of Beckhoff Group companies at any time.

2. Digital reporting channel

Communication with you as the whistleblower takes place via a protected mailbox in the reporting system, known as the digital reporting channel. The Beckhoff digital reporting channel for the complaints procedure in accordance with the LkSG can be found at the following link:

<https://www.beckhoff.com/en-en/whistleblower-system/>

When you submit a report, you will receive a mailbox with login details for the digital reporting channel. The digital reporting channel is available around the clock. It allows you to submit your reports in German and English in text form.

The Beckhoff Group uses a certified and data protection-compliant solution from EQS Group AG, based in Munich, to handle the combined whistleblower and complaints system. More information on the security of this solution can be found on the homepage: <https://www.integrityline.com/de/sicherheit/> (the operator is solely responsible for the content of this website; the Beckhoff Group bears no responsibility for the content presented).

3. Principles of the procedure

Summary: You can report violations openly or anonymously. The more specific your report, the better. False accusations or denunciations are not in line with the values of the Beckhoff Group.

A transparent and confidential reporting channel is a prerequisite for an effective complaints procedure. Beckhoff therefore undertakes to process every report comprehensively, initiate appropriate measures, and clarify legal violations. Together, we can find a permanent resolution for misconduct and prevent it in the future.

The digital reporting channel that we provide enables anonymous reports to be submitted. This allows you to remain anonymous as a whistleblower. The decision as to whether you submit the report openly – stating your name and contact details – or anonymously is entirely up to you. If you choose to make an anonymous report, anonymous contact and anonymous communication between you and Beckhoff is made possible.

We process every report received and meticulously investigate the reported facts of the case.

In order to meet this requirement, we are dependent on the information you provide. The more specific and detailed your information regarding the risks or violations is, the better able we are to investigate the report. You can use the following five questions as a guide:

What?	What is the risk/violation?
Who?	Who created the risk or allowed it to arise? Who committed the violation? Who else knew about it? Who was involved?
When?	When or over what period of time did the risk exist or did the violation occur?
How?	How was the risk created or the violation committed? Is there any evidence to document this?
Where?	Where did the risk occur? Where was the violation committed?

With our complaints procedure, we want to become even better in terms of our compliance. The complaints procedure is not intended for making false accusations or denunciations. Behavior of this kind is not in line with our values or the Beckhoff Group's commitment to conduct itself with fairness and integrity. In this respect, the complaints procedure must not be used to make false accusations. Reporting information that you know to be false is not permitted and may lead to consequences under labor law and/or criminal law.

4. How the complaints procedure works

Summary: We will process your report efficiently and swiftly within the required time frame. You can submit your report in text form in your national language via the digital reporting channel or contact the human rights officer centrally. We will review the complaint and take remedial measures, which we will follow up on. We will remain in close contact with you regarding the individual steps. The review will be impartial and confidential.

In order to build trust in the complaints procedure Beckhoff has established for affected persons and whistleblowers, we consider it necessary to transparently explain how the complaints procedure works after a complaint has been submitted.

A complaints committee ("**Complaints Committee**") set up centrally for Beckhoff at Beckhoff Automation GmbH & Co. KG is responsible for processing your report. The Complaints Committee consists of representatives of the company management, the Environment and Sustainability department, and the Legal department of Beckhoff Automation GmbH & Co. KG. The members of the Complaints Committee are also case handlers ("**Case Handlers**").

You can communicate directly with the Case Handler responsible for your report via the digital reporting channel. You can also contact the person responsible for our complaints procedure centrally:

Beckhoff Automation GmbH & Co. KG
 Ms. Anne Schaper

Head of the Environment and Sustainability department in the role of human rights officer

Email: a.schaper@beckhoff.com

Phone: +49 (0) 5246 963-0

Available on weekdays between 10:00 a.m. and 4:00 p.m. CET

If you contact the person responsible for our complaints procedure directly, they will first agree upon a communication channel with you. The procedure is also similar to the procedure in the digital reporting channel.

However, we recommend that you communicate exclusively via the Case Handler and the digital reporting channel.

Confidentiality and data protection have the highest priority for us when processing reports. All Case Handlers have signed a confidentiality agreement. The members of the Complaints Committee (Case Handlers) act impartially when processing your report, are independent, and are not bound by instructions. If we determine that the potential violation reported is related to a person on the Complaints Committee, that person will be excluded from processing the report. We therefore meet the requirements set out in Section 8 (3) LkSG for the complaints procedure.

The duration of the procedure depends heavily on the facts of the case and can range from a few days and weeks to several months. We endeavor to bring the procedure to a satisfactory conclusion as efficiently as possible. We will also keep you informed on the progress of the procedure on a regular basis as part of our work processing the complaint. We therefore recommend that you regularly log into the digital reporting channel and check your own case for new messages.

We are committed to ensuring a transparent and fair processing procedure. As a whistleblower, you can be sure that every report will be given consideration and processed immediately. You will receive confirmation that your submitted report has been received within seven days in accordance with Section 8 (1) (3) LkSG.

A Complaints Committee will pick up the report you have submitted to the system and initiate the processing procedure.

First, a Case Handler will check whether the LkSG applies to your complaint and whether the suspicion of a risk or violation is confirmed (plausibility check). If information is missing or requires further clarification, we will contact you via the mailbox that you have been given the login details to and ask you questions.

In the event that the suspicion is not confirmed in the plausibility check, the procedure will be discontinued. You will receive notification that the procedure has been discontinued, together with a brief explanation, no later than three months after you have received confirmation of receipt.

If your suspicion is confirmed, your report will be investigated further in factual and legal terms. Within three months of the confirmation of receipt being received, the Case Handler will inform you of the next steps, the time frame of the procedure, and how you will be protected as a whistleblower. The Case Handler will discuss the facts of the case with you in order to gain a better understanding and clarify any unanswered questions. They can discuss your expectations regarding possible preventive or remedial measures with you. If necessary, they will initiate further investigations to clarify the facts of the case. The Case Handler can work out a proposal for a solution (remedy) in consultation with you. Remedial measures agreed with you will be implemented by the Beckhoff Group companies concerned. Implementation is followed up by the Complaints Committee.

If the responsibility for a risk or violation lies with a direct or indirect supplier, the Complaints Committee will request that the supplier implements the remedial measure. The Complaints Committee will review the implementation of the measure by the supplier in a timely manner.

Please note that information in the context of complaints procedures can only be communicated to whistleblowers to the extent that this is legally permissible and further internal/external investigations are not jeopardized.

5. Protection of whistleblowers

Summary: We will protect you as a whistleblower against disadvantage or punishment if you have made the complaint to the best of your knowledge and in good faith. We will protect your identity as a whistleblower. We will comply with the statutory data protection requirements at all times.

As a whistleblower, you should not fear any adverse action by the Beckhoff Group as a result of the report if you have made the complaint to the best of your knowledge and in good faith. We ensure that no one is deterred from making a justified complaint out of fear of negative consequences or social pressure. We will not tolerate reprisals against anyone who submits a complaint of this nature. You are protected as a whistleblower in accordance with Section 8 (4) (2) LkSG if you submit reports for the complaints procedure to Beckhoff using the digital reporting channel provided for this purpose or contact the human rights officer centrally, provided that the report submitted contains information on risks or violations as defined in the LkSG and provided that you do not knowingly, intentionally, or recklessly submit false or misleading reports.

Equally, we work with our suppliers to ensure that you are not exposed to any adverse action as a result of submitting your complaint.

In the event that you deliberately provide false information, you should expect sanctions, in particular measures under labor law, up to and including termination of the employment relationship, and/or consequences under criminal law.

We will treat your identity as a whistleblower confidentially and protect your personal data in accordance with applicable law – in particular also vis-à-vis our suppliers. Unauthorized persons are denied access to the identity data.

It is essential that Beckhoff operates a complaints procedure that complies with the statutory data protection requirements in every respect.

6. Consequences of a violation

We are committed to complying with laws, regulations, and internal guidelines. No transaction or advantage, no matter how favorable, justifies a violation of the law or regulations. We do not tolerate irregular or illegal behavior and will sanction any such behavior with appropriate measures – for example, through measures under labor law, up to and including termination of the employment relationship.

7. Further development of the complaints procedure

In accordance with Section 8 (5) LkSG, we will review the effectiveness of our complaints procedure at least once a year and on an ad hoc basis, and adapt it if necessary.

8. Publication and consideration

These rules of procedure are publicly available on the website of Beckhoff Automation GmbH & Co. KG at [[Whistleblower system | Beckhoff Worldwide](#)] in accordance with Section 8 (2) LkSG.